The Honorable Richard A. Jones 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 10 UNITED STATES OF AMERICA, NO. CR20-151RAJ 11 Plaintiff, **UNOPPOSED MOTION TO SEAL** 12 v. 13 14 Noting date: June 25, 2021 EPHRAIM ROSENBERG, 15 Defendant. 16 17 The United States of America, by and through Tessa M. Gorman, Acting 18 United States Attorney for the Western District of Washington, and undersigned counsel, 19 files this motion respectfully requesting that the Pretrial Petition and Order (Dkt. #81), in 20 the above-captioned matter, be filed under seal and remain under seal. 21 On June 17, 2021, a petition and order modifying the terms of Defendant's pretrial 22 bond appeared on the docket. That filing, prepared by the U.S. Pretrial & Probation 23 Office, included, among other things, the name of "Person-1," a potential witness who 24 was the recipient of a perceived threatening message. Person-1 is not a charged

defendant, nor is Person-1 a target of the criminal investigation. The filing reveals

personal information about Person-1, evidenced by the fact that at least one media outlet

found additional information on-line about Person 1 and attempted to contact Person-1

25

26

27

28

directly.

Accordingly, the United States respectfully requests that the Pretrial Petition and 1 Order (Dkt. #81), in the above-captioned matter, be filed under seal and remain under 2 seal. Defendant, through counsel, does not oppose this request for sealing. 3 Alternatively, the United States requests that a redacted version of the Pretrial 4 Petition and Order (Dkt. #81), redacting the name and identifying information of 5 Person-1, be filed on the docket. 6 DATED this 25th day of June, 2021. 7 8 Respectfully submitted, 9 TESSA M. GORMAN 10 Acting United States Attorney 11 12 s/Steven Masada s/Nicholas Manheim 13 STEVEN MASADA NICHOLAS MANHEIM 14 Assistant United States Attorneys 15 United States Attorney's Office 700 Stewart Street, Suite 5220 16 Seattle, WA 98101-1271 17 Telephone: (206) 553-7970 (206) 553-4440 18 Fax: 19 20 21 22 23 24 25 26 27 28